

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jane Doe 1, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.,

Defendant.

Case No. 1:22-CV-10019 (JSR)

**DECLARATION OF DAVID BOIES IN FURTHER SUPPORT OF
PLAINTIFF JANE DOE 1'S MEMORANDUM OF LAW IN OPPOSITION
TO DEFENDANT JPMORGAN CHASE BANK, N.A.'S MOTION TO
EXCLUDE PLAINTIFF'S EXPERT**

I, David Boies, declare as follows:

1. I am a member in good standing of the bar of the State of New York and am admitted to practice before this Court. I am the Chairman and a Managing Partner of Boies Schiller Flexner ("BSF"). I make this declaration on my own personal knowledge, and if called as a witness to testify, I could and would testify competently to the following facts.

2. I submit this declaration in further support of the motion filed by Jane Doe 1 for class certification and approval of BSF as Class Counsel.

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the April 27, 2023, deposition of Kimberly Mehlman-Orozco, designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

4. Attached hereto as **Exhibit 2** is a true and correct copy of Exhibit 6 from the April 7, 2023 deposition of Mary Casey, designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

5. Attached hereto as **Exhibit 3** is a true and correct copy of Exhibit 7 from the April 7, 2023 deposition of Mary Casey designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a document produced by JPMC, bates stamped JPM-SDNYLIT-W-0021942 designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

7. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced by JPMC, bates stamped JPM-SDNYLIT-00100935 designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

8. Attached hereto as **Exhibit 6** is a true and correct copy of a document produced by JPMC, bates stamped JPM-SDNYLIT-00029817 designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

9. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the May 3, 2023 deposition of William Langford designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

10. Attached hereto as **Exhibit 8** is a true and correct copy of a document produced by JPMC, bates stamped JPM-SDNYLIT-0036565 designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

11. Attached hereto as **Exhibit 9** is a true and correct copy of JPMC's Second Set of Interrogatories Responses to 30(b)(6).

12. Attached hereto as **Exhibit 10** is a true and correct copy of documents produced by JPMC, bates stamped JPM-SDNYLIT-00100983-00100985 designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

13. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the March 15th deposition of Mary Erdoes designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 22, 2023

Respectfully Submitted,

By: /s/ David Boies

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